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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Case No. 11-CIV-7633-(PAC)-(HBP)

INES FIGUEROA

v.

Plaintiff

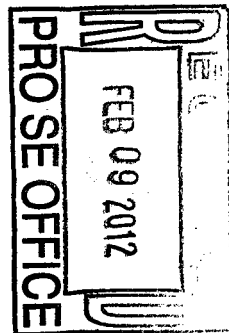
AFFIRMATION OF INES FIGUEROA
IN OPPOSITION TO DEFENDANT(S)
FOR SUMMARY JUDGMENT

PONCE DE LEON FEDERAL BANK

Defendant

PURSUANT THE FEDERAL CIVIL RIGHTS, this case shall be reviewed by the Honorable Judge for the following reasons:

1) In Response to Motion to Admit Counsel - Pro Hac Vice , with respect to the statement and copies submitted by the Attorney Peter A. Halprin, Esq., Anderson Kill & Olick, P.C., office located at at building 1251, Avenue of the Americas, New York, New York.



2) I am a single parent who have been forced to (learn about the law, but unfortunately, have never expected to experience the abuse I was put through by several individuals without any type of consideration to the extent that employees in the working area were able to join and enjoy the **uncommon situation I was put through several times were I was never able to find an individual to defend me from the oppression I had experienced** and which I always had hope **that things** were normal since my intention was to hold a job and stay for retirement just as everybody in the place at age 48, and after 13 years of service at Ponce De Leon Federal Bank.

3) I am hereto agree that the Attorney Marc G. Tarlow, Esq. who had represented defendant PONCE DE LEON FEDERAL BANK do have an outstanding record and reputation. Because of him being such a great Lawyer he is aware of what really **went on with my case** so did the

Bank. The Lawyers involved back then, were specialists in this type of cases, therefore, because of so much **Abuse of Power** involved my case became to be a pitiful one to the point that as of today no one ever wanted to take it over since day one. There were intentions on their behalf were to **hurt me not only financially, but psychologically and emotionally which really impacted me**. There was an important factor which was not considered while my case was being processed and this was very easy for the Defendants to do because the Bank's personnel with higher up positions and other co-workers tried the same pattern of treating **me differently based on the reputation given to me** from the others employees.

4) Mr. Tarlow did sent a letter written on year 2005 to the attorneys that were representing me and I got to read on February 2007 when given to me by the attorney also representing me Mr. Edward Wolf at his office and which anyone who will read and think about it does not say any positive things about me. The Legal representation I had hired unfortunately, had committed legal **intentional misrepresentation**. (please refer to the original submission which the **section of Civil Rights was left blank which was part of my original complaint**). The individuals involved in this case **knew exactly** what was all about it. I did sent letters to the Division of Human Rights and to the Equal Employment Commission and I was **ignored**. So I did called the Bar Association right from the Bank to tell them about the legal misrepresentation and unethical actions and the lady who answered the telephone stated that if they found probable cause that I had not to complaint.

5) Mr. Tarlow was also in a conference phone call stated screaming which having a meeting on October 20 or 28, 2006 (where I personally face to face the Retaliation action just done by the Bank when they promoted a second person in my face TRYING TO PROVOKE MY EMOTIONS AND

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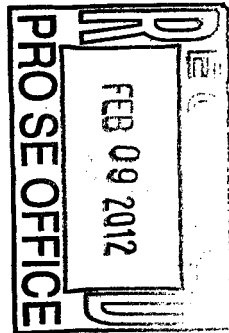
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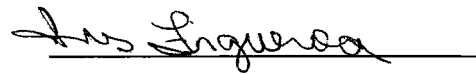
EXPECTING ME TO REACT IN AN aggressive way and I was IGNORED) as I was sitting down with Mr. Jeremy or Jeff the Division of Human Rights who was supposed to be the adjuster or the investigator (who ignored me and deviated me when I was telling him face to face about the Retaliation that had just taken place when they had promoted a second employee and making sure that I was present so everyone employees from the department and the President and CEO of the Bank were part of the expectations and all waiting to see my reaction it was embarrassing and humiliating) in front of the Lawyer Mr. Jason Wolf who had told them that I was going to take the clients with me, **"something that I never stated."** Mr. Tarlow also screamed again when I had Mr. Jason told him over the phone the I had given him a letter requesting for \$600,000. and he screamed again **"Is she is crazy or what."** The bank was so used to disrespect me for thirteen years that they had everything controlled therefore they felt very comfortable abusing me psychologically in conjunction with three consecutive Supervisors in that same department. As a result the conceptualization and perception the Bank had towards me, was the key to prejudgment about me was the way I got to be treated in a disrespectful.

6) I am not requesting for Mr. Tarlow to be suspended because he knows the Law better than me, but he did ignored the fact that what was stated in the letter which since he did not know me it was assumed by him and the Bank that not only I was not qualified, but he also made a statement that the Bank was going to hire a person from the outside which at **no point was true**, since part of the second promotion they did practiced was from a well-trained worker who arrived to the Bank years later with much luck. It never hurt me the promotions that took place in that Department since I was never welcome within the department since I was extremely abused by three consecutive supervisors. But the

most thing that hurt me was the harassment used and the demoralization, innuendos, lies over lies and being a scape goat to their convenience. Then to have other outside professional individuals and build a reputation towards me and "discriminate me with a smile," and Mr. Tarlow as well as the Human Resources and the President of the Bank were aware of the abuse and the Bank never received and complaint from any of its clients I understand that of the factors was my color, but that was not my fault.

Dated: February 6, 2012
New York, New York

Respectfully,

A handwritten signature in cursive script, appearing to read "Ines Figueroa", is written over a horizontal line.

Ines Figueroa
1001 Jerome Avenue
Apartment (9-A)
Bronx, N.Y. 10452

I affirm and "declare under penalty of perjury that the foregoing is true and correct," (That false

Statements in an Affidavit or Affirmation are punishable for perjury.)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Ines Figueroa

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

- against -

Ponce De Leon Federal Bank

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

11 Civ. 7633 (PAC) (HBP)

AFFIRMATION OF SERVICE

I, Ines Figueroa, declare under penalty of perjury that I have
(name)
served a copy of the attached Reply to support defendant's motion (Re: Lawyer)
(document you are serving)
upon Peter A. Halgrin whose address is _____
(name of person served)
1251 Avenue of the Americas, New York, NY.
(where you served document)
by Hand Delivery
(how you served document: For example - personal delivery, mail, overnight express, etc.)

Dated: New York, NY
(town/city) (state)
February 09, 2012
(month) (day) (year)

Ines Figueroa
Signature
1001 Jerome Ave (9A)
Address
Bronx, NY.
City, State
10452
Zip Code
718-588-1941
Telephone Number